

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA and  
THE STATE OF NEW YORK ex rel.  
DR. ANTONI NARGOL and  
DR. DAVID LANGTON,

Plaintiffs-Relators,

v.

DEPUY ORTHOPAEDICS, INC., DEPUY, INC.,  
and JOHNSON & JOHNSON SERVICES, INC.,

Defendants.

Case No. 12-10896-MPK

HONORABLE  
M. PAGE KELLEY

**STATUS REPORT REGARDING  
MOTION TO WITHDRAW APPEARANCE**

At the hearing on January 11, 2022 regarding the undersigned counsels' motion to withdraw appearance, the Court directed movants Jayne Conroy, Justin Presnal, and Laura Fitzpatrick of Simmons Hanly Conroy LLC; W. Mark Lanier and Kathryn Rachel Lanier of the Lanier Law Firm; and Richard J. Arsenault of Neblett, Beard & Arsenault, to provide a status report to the Court by January 21, 2022 regarding the Relators' objection to the motion to withdraw.

The undersigned counsel are engaged in discussions with Relators and Mr. Brooks about the motion to withdraw, and are hopeful that Relators will agree to withdraw their objection. However, the movants and Relators need a few extra days to see if an agreement can be reached.

Consequently, the movants report that, as of the filing of this status report, Relators still stand on their objection. Movants also stand on their motion, assert that it should be granted despite the objection, especially in light of the Court's denial of Mr. Brooks' and Relators post-trial motion today (ECF No. 675), and reserve all rights with respect thereto. However, movants will file a supplemental status report on or before January 26, 2022 advising whether an agreement to withdraw Relators' objection has been reached.

Dated: January 21, 2022

Respectfully submitted,

/s/ Justin Presnal  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2022, in addition to serving all parties and counsel of Movants' Motion to Withdraw Appearance (ECF No. 651) using the court's CM/ECF system, I also served the motion on Relators Antoni Nargol and David Langton via electronic mail, pursuant to Local Rule 83.5.2(d).

/s/ Jayne Conroy  
Jayne Conroy